

August 9, 2012

VIA ECFS

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: *Special Access Rates for Price Cap Local Exchange Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, WC Docket No. 05-25, RM-10593*

Dear Ms. Dortch:

On August 7, 2012, the undersigned of tw telecom inc. (“tw telecom”) had a telephone conversation with Eric Ralph, Chief Economist of the Wireline Competition Bureau. During the call, I addressed questions from Mr. Ralph regarding the data that tw telecom would be able to provide in response to a mandatory data request in the above referenced proceeding. In particular, I explained that tw telecom would be able to provide billing data differentiating between its customers that are end users and its customers that are other carriers purchasing services from tw telecom at wholesale. Mr. Ralph and I also discussed aspects of tw telecom’s pricing policy, including (1) that tw telecom negotiates many of its prices with its customers; and (2) that, in contrast, when purchasing special access services at wholesale from other carriers, tw telecom almost always pays prices that are set forth in ILEC tariffs.¹

On August 8, 2012, I had an additional telephone conversation with Mr. Ralph during which I further described the billing data that is available to tw telecom. I explained (1) that tw telecom would be able to provide the CLLIs and services addresses associated with the locations to which it provides services; and (2) that tw telecom would be able to provide data indicating whether tw telecom serves a given customer entirely over its own facilities or over facilities that it purchases from another carrier at wholesale.

¹ For further explanation of this point, I referred Mr. Ralph to tw telecom’s recent filings in this proceeding. See, e.g., Letter from Thomas Jones & Matthew Jones, Counsel for tw telecom, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 05-25, et al., Highly Confidential Attachment at 16-20, 21-22 (filed April 11, 2012)

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Please do not hesitate to contact me if you have any questions or concerns regarding this submission.

Respectfully submitted,

/s/ Rochelle Jones

Rochelle Jones

Senior Vice President, Federal Regulatory Affairs
tw telecom inc.

cc (via email): Eric Ralph